

Management System: Environment, Safety, and Health

Subject Area: Environmental Compliance

Procedure: Preparing Quality Assurance (QA) Plans for National Environmental Policy Act (NEPA) Process

Issue Date and Revision Number: 9/26/16 0	Lead Subject Matter Expert: Pete Yerace	Management System Owner: John Sattler
--	---	---

1.0 Applicability

This Plan applies to the EMCBC and/or Service Level Agreement (SLA) Site Staff involved with National Environmental Policy Act (NEPA) compliance activities such as Categorical Exclusion (CX) Determinations, Environmental Assessments (EAs), Findings of No Significant Impact (FONSIs), Environmental Impact Statements (EISs), Records of Decision (RODs), and any other document prepared pursuant to the U.S. Department of Energy (DOE) or the Council on Environmental Quality (CEQ) NEPA Regulations. This includes the EMCBC Director/SLA Director-Federal Project Director (FPD), NEPA Compliance Officers (NCOs), and NEPA Document Managers (NDMs).

2.0 Required Procedure

Step 1	The EMCBC/SLA NCO, when developing NEPA documents, has the option to develop project specific Quality Assurance Plans (QAPs) or develop a separate EMCBC/SLA QAP for their NEPA compliance program. The EMCBC QAP contents are to be consistent with DOE O 414.1D, Admin. Change 1, Quality Assurance, and the EMCBC/SLA QA Program Plan. A suggested format/content follows: <ol style="list-style-type: none"> 1. Introduction: Provide a general remarks section concerning the EMCBC/SLA NEPA compliance program or project-specific NEPA. 2. Scope and applicability: Discuss the relationship to other QAPs, such as overall organizational plans and subsidiary plans.
---------------	---

3. Primary regulations, procedures, guidance, and other NEPA tools: Cite comprehensive lists identified on the Office of NEPA Policy and Compliance website. If documents are individually cited, cite the following at a minimum: (1) 40 CFR Part 1500 - 1508, Council on Environmental Quality (CEQ): Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (NEPA); (2) 10 CFR Part 1021, U.S. Department of Energy (DOE): National Environmental Policy Act (NEPA) Implementing Procedures; (3) 10 CFR Part 1022, Compliance with Floodplain and Wetland Environmental Review Requirements; and (4) DOE O 451.1B, Admin. Change 3, National Environmental Policy Act Compliance Program.
4. Organizational roles and responsibilities: Cite current organization charts.
5. NEPA process QA infrastructure: Discuss the following :
 - Program: Describe the organization within which the NEPA function resides. Describe the status of the NEPA program and delegations.
 - Staff training and qualification: Describe required or recommended NEPA qualifications and/or training for Federal and contractor staff involved in the NEPA process.
 - Quality improvement: Describe processes that can be used in NEPA to detect and prevent quality problems (e.g., the Lessons Learned Questionnaire completed subsequent to EAs and EISs).
 - Documents and records: Describe systems that can be used for maintaining NEPA documents and records.
 - Work process: Describe processes for performing NEPA related work.
 - Design: Describe or refer to the characteristics of a quality NEPA document. See DOE NEPA Guidance: Revised Recommendations for the Preparation of Environmental Assessments and Environmental Impact Statements (The Green Book), 2nd Edition.
 - Procurement: Describe contracting options/vehicles for obtaining quality contractor support on NEPA efforts.
 - Inspection and acceptance testing: Describe mechanisms for finalizing NEPA documents.

	<ul style="list-style-type: none"> • Management assessment: Discuss the plan to conduct internal assessments of site program compliance. • Independent assessments: Discuss the plan to conduct external assessments of program compliance.
Step 2	EMCBC/SLA NCOs develop and maintain QAPs for their respective NEPA program. The QAPs are to meet DOE O 414.1D, Admin. Change 1, Quality Assurance, requirements. The QAPs should tier from higher level QAPs such as the EMCBC/SLA QAP or their respective office QAPs. Material already contained in higher level QAPs may be cited, but should not be repeated—the EMCBC/SLA organizational unit’s NEPA QAP augments higher level QAPs. EMCBC and SLA sites, when developing EAs or EISs, should consider if they need to prepare a supplement to their site QAP.
Step 3	NEPA Document Managers may develop project specific QAPs for EAs and EISs. If prepared, the QAPs are to meet DOE O 414.1D, Admin. Change 1 requirements. The EA or EIS-specific QAP tiers off higher level QAPs. Preparation of such QAPs may be reserved for especially complicated EAs and EISs.
Step 4	The NCO ensures that official plans are maintained in accordance with applicable EMCBC, SLA, or Field Operation Site office records management requirements.

3.0 References – Forms/Attachments/Exhibits

3.1 References

- 10 CFR Part 1021, U.S. Department of Energy (DOE): National Environmental Policy Act (NEPA) Implementing Procedures
- 10 CFR Part 1022, Compliance with Floodplain and Wetland Environmental Review Requirements
- 40 CFR Part 1500 - 1508, Council on Environmental Quality (CEQ): Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (NEPA)
- DOE O 414.1D, Admin. Change 1, Quality Assurance (04/25/2011)
- DOE O 451.1B, Admin. Change 3, National Environmental Policy Act Compliance Program (01/19/2012)
- DOE NEPA Guidance: Revised Recommendations for the Preparation of Environmental Assessments and Environmental Impact Statements (The Green Book), 2nd Edition (Memorandum, 12/23/2004)
- EMCBC Management System: Quality Assurance and Oversight
- EMCBC Management System: Records Management

- 42 U.S.C. 4321 et seq., National Environmental Policy Act (NEPA) of 1969, As Amended

4.0 Records Generated

Records generated by the EMCBC through implementation of this procedure are identified as follows and maintained by the Office of Technical Support & Asset Management in accordance with the EMCBC Organizational File Plan. SLA and Field Operation Sites shall maintain records generated through implementation of this procedure under the same records category code which is the equivalent to the DOE records disposition authority, and are managed in accordance with their respective site file plan.

Records Category Code	Records Title	Responsible Organization	Quality Records Classification (Lifetime, Non-Permanent, or Not Applicable)
ENV-02-F-04	National Environmental Policy Act and Related Laws Documentation, Support Documentation	Office of Technical Support & Asset Management, or applicable SLA or Field Operation Site Office	Not Applicable

EMCBC RECORD OF REVISION

DOCUMENT TITLE: Preparing Quality Assurance Plans for NEPA Process

If there are changes to the controlled document before the two-year review cycle, the revision number stays the same; one of the following will indicate the change:

I Placing a vertical black line in the left margin adjacent to sentence or paragraph that was revised; or

I Placing the words GENERAL REVISION at the beginning of the text. This statement is used when entire sections of the document are revised.

If changes and updates occur at the two-year review cycle, the revision number increases by one.

Rev. No.	Description of Changes	Revision on Pages	Date
0	Revised Document to align with new Executive Order 13693 requirements	All	09/26/16